

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

BRENDAN McGUINNESS,

CIVIL ACTION NO. 05-11738-EFH

Plaintiff,

v.

JAMES R. BENDER,  
LOIS RUSSO,  
MICHAEL D. FARLEY,  
JASON J. OLIVER,  
DAVID M. SHAW,  
JUAN MEZA,  
JOHN A. BELAIR, and  
JOHN A. FLOWERS,

Defendants.

**MOTION TO FURTHER ENLARGE TIME FOR RESPONDING TO DISCOVERY**

The defendants, by counsel, move that the time for responding to the plaintiff's two sets of interrogatories, each entitled "Plaintiff's Request for Admissions and/or Interrogatories of Defendants, dated August 11, 2006, be further enlarged up to and including **November 3, 2006**. Defendants Flowers, Farley, Meza and Oliver have completed their interrogatory responses. These responses have been transmitted by fax to MCI-Cedar Junction and served on the plaintiff. Defendant Belair has been out of the facility this week, and therefore, his interrogatory responses, as well the original responses of the other defendants, will be served on the plaintiff next week.

Dated: October 27, 2006

Respectfully submitted,

NANCY ANKERS WHITE  
Special Asst. Attorney General

/s/ William D. Saltzman

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**CERTIFICATE OF SERVICE**

I hereby certify that this document(s) filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non registered participants on October 27, 2006.

Dated: October 27, 2006

/s/ William D. Saltzman

William D. Saltzman